

EXHIBIT 2

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE SOUTHERN DISTRICT OF NEW YORK
2 CIVIL ACTION NUMBER 7:21-cv-02485-VB

3 GERALD HAYDEN, :
4 Plaintiff, :
5 vs. :
6 INTERNATIONAL BUSINESS MACHINES :
7 CORPORATION, PABLO SUAREZ and :
8 SHANKER RAMAMURTHY, :
Defendants. :
X

<p style="text-align: right;">Page 54</p> <p>1 So to handle that in A2E, I integrate 2 with your certified financial planner. Certified -- 3 as you probably know, a certified financial planner 4 is supposed to look at your total financial array. 5 You got the right insurance policy, you got the 6 right coverage, you got the lowest price. Only 7 about 4 percent of certified financial planners do 8 that, even though they're all supposed to do it. 9 So by knowing that and knowing the 10 prediction of failure, 90 -- over 95 percent of 11 failures is due to cash flow.</p> <p>12 THE COURT REPORTER: Due to cash 13 flow...</p> <p>14 THE WITNESS: Cash flow. Cash flow 15 problems.</p> <p>16 BY MR. YOTHERS:</p> <p>17 Q So let's turn to the slide in here 18 that has the Bates number GH46.</p> <p>19 That says "Why Junos" in the center 20 there, right?</p> <p>21 A Yes.</p> <p>22 Q What is Junos?</p> <p>23 A Junos is the operating system for 24 Juniper Networks.</p> <p>25 Q And was that something that Juniper</p>	<p style="text-align: right;">Page 56</p> <p>1 cloud wasn't even really around.</p> <p>2 Q Are you saying hybrid or hyper?</p> <p>3 A Hybrid.</p> <p>4 Q Hybrid?</p> <p>5 A As in IBM Red Hat.</p> <p>6 Q When did IBM cloud first come into 7 existence?</p> <p>8 A I couldn't tell you that. I'd have to 9 look it up. It's 10 less. Maybe 10 years.</p> <p>10 Q But you couldn't do A2E until there 11 was hybrid cloud?</p> <p>12 A I could execute on A2E by giving a 13 vision. Because when you sell to executives, the 14 first question a CIO will ask you is, what's your 15 roadmap. In other words, not what you're giving me 16 today, what you're going to go in the future. So 17 you have to give them that vision so they know, 18 yeah, you know, that's right, this keeps me on the 19 path. That's part of how you sell.</p> <p>20 Q So it was only a vision until hybrid 21 cloud came, and then that provided the technology to 22 actually do --</p> <p>23 THE COURT REPORTER: I'm sorry, excuse 24 me. And that provided...</p> <p>25</p>
<p style="text-align: right;">Page 55</p> <p>1 Networks sold to customers or clients?</p> <p>2 A That's the way they do their 3 technologies. One operating -- a single operating 4 system.</p> <p>5 Q And did Junos incorporate any aspects 6 of A2E?</p> <p>7 A No. It had nothing to do with their 8 technology, it had to do with selling it.</p> <p>9 Q So A2E was useful in selling Junos, it 10 wasn't part of Junos?</p> <p>11 A Correct.</p> <p>12 Q And then I look at this fourth bullet 13 point here, it says, "Connecting any and all data 14 centers facilitated"; do you see that?</p> <p>15 A Yes.</p> <p>16 Q That looks like number 4 on slide 9 17 that we were just looking at; is that right?</p> <p>18 A It's related. They're close cousins, 19 yes.</p> <p>20 Q And then if you turn with me to the 21 slide that says GH48 on the upper right.</p> <p>22 A You know, I should qualify, this is 23 visionary. Junos doesn't do hybrid cloud, to make 24 that clear, okay? You can't do A2E without hybrid 25 cloud. Junos did not have hybrid cloud. Hybrid</p>	<p style="text-align: right;">Page 57</p> <p>1 BY MR. YOTHERS:</p> <p>2 Q -- the technology to implement A2E; is 3 that right?</p> <p>4 MR. STONE: Please, you gotta pause a 5 little bit so you give me an opportunity to 6 hear the question --</p> <p>7 THE WITNESS: Okay.</p> <p>8 MR. STONE: -- and object. And also 9 we want a record where you're not talking over 10 him.</p> <p>11 THE WITNESS: Yeah.</p> <p>12 MR. STONE: So just pause until he 13 finishes the question, give me an opportunity 14 to object. Thank you.</p> <p>15 BY MR. YOTHERS:</p> <p>16 Q Yeah. So I was just asking, at the 17 time it was a vision, back in 2009, and it was the 18 arrival of hybrid cloud that provided the technology 19 to implement A2E; is that right?</p> <p>20 A No. You could implement certain 21 things of A2E, but you could certainly use parts of 22 A2E without hybrid cloud. But in order to run the 23 whole formula is a dependency on hybrid cloud. 24 That's why IBM bought Red Hat.</p> <p>25 Q And if we --</p>